

1 JULIE A. MERSCH, ESQ.
2 Nevada Bar No. 004695
3 LAW OFFICE OF JULIE A. MERSCH
4 701 S.7th Street
5 Las Vegas, NV 89101
6 (702) 387-5868
7 Fax: (702) 387-0109
8 jam@merschlaw.com

9 *Attorney for Plaintiff*

10 Georlen Spangler, Esq.
11 Nevada Bar No. 3818
12 LAW OFFICE OF GEORLEN K. SPANGLER
13 2620 Regatta Drive, Suite 102
14 Las Vegas, Nevada 89128
15 Phone: 702.381.5830
16 E-Mail: spanglerlaw@outlook.com

17 *Attorneys for Defendant*

18 ***Admitted Pro Hac Vice***

19 Iwana Rademaekers, TX Bar No. 16452560
20 LAW OFFICES OF IWANA RADEMAEKERS, P.C.
21 14785 Preston Road, Suite 550
22 Dallas, Texas 75254
23 Main: (214) 579-9319
24 Fax: (469) 444-6456
25 Email: iwana@rademaekerslaw.com

26 *Attorneys for Defendant*

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

29 TATIANA BUSHEE,

30 Plaintiff,

31 v.

32 LIBERTY LIFE ASSURANCE
33 COMPANY OF BOSTON as Claims
34 Administrator for the Safeway, Inc. Group
35 Disability Income Plan; DOES I through
36 V; and ROE CORPORATIONS I through
37 V, inclusive,

38 *Defendant.*

Case No. 2:18-CV-00804-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND CERTAIN DEADLINES**

FIRST REQUEST

1 IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned
2 counsel that, pursuant to LR 26-4, certain deadlines entered by the Court during the Hearing on
3 July 5, 2018, be amended as follows:

4 Certain documents were requested by Plaintiff to be added to the Administrative Record.
5 Defendant does not object to the inclusion of these additional documents to the Record and
6 Defendant's counsel is in the process of obtaining these documents and requires additional time
7 to do so. As such, the Parties are unable to file a complete Administrative Record at this time.
8 Additionally, until such time as Plaintiff can review these additional documents being gathered
9 by Defendant, the Parties cannot make an accurate representation to the court in their Joint
10 Statement regarding unresolved issues. Accordingly, the parties request the following revisions
11 to the current schedule:

12 **PROPOSED SCHEDULE**

<u>Deadline</u>	<u>Current</u>	<u>Proposed</u>
Last day to file Joint Administrative Record	Aug. 29, 2018	Sept. 4, 2018
Last day to file Joint Statement	Aug. 29, 2018	Sept. 4, 2018

16 We, the undersigned, agree to the proposed scheduling as indicated above. We, the
17 undersigned, also represent to the Court that we are working together cooperatively and in good
18 faith to resolve the issues described above. The extension of these deadlines will not affect any
19 other deadlines previously set by the Court.

20 DATED this 29th day of August 2018.

21
22 LAW OFFICE OF JULIE A. MERSCH

23
24 LAW OFFICES OF IWANA
RADEMAEKERS, P.C.

25 _____ /s/ Julie A. Mersch
Julie A. Mersch, Nevada Bar No. 004695
701 S.7th Street
Las Vegas, NV 89101
Email: jam@merschlaw.com

26
27 Attorneys for Plaintiff

28 _____ /s/ Iwana Rademaekers
Iwana Rademaekers, TX Bar No. 16452560
Admitted Pro Hac Vice
14785 Preston Rd, Suite 550
Dallas, Texas 75254

- AND -

1
2 LAW OFFICE OF GEORLEN K.
3 SPANGLER

4 _____
5 /s/ Georlen Spangler

6 Georlen Spangler, Nevada Bar No. 3818
7 2620 Regatta Drive, Suite 102
8 Las Vegas, Nevada 89128
9 Phone: 702.381.5830

10 *Attorneys for Defendant Liberty Life
11 Assurance Company of Boston*

12 **ORDER**

13 IT IS SO ORDERED _____, 2018.

14 
15 _____
16 United States Magistrate Judge